

MEMO ENDORSED

Allan Chan & Associates

April 29, 2024

Hon. Edgardo Ramos - VIA ECF
U.S. District Court -Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

The Court will consider the statements withdrawn. SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: August 30, 2024
New York, New York

Re: Amimon, Inc. et al v. Shenzhen Hollyland Tech Co., Ltd et al. - No. 1:20-CV-09170
Letter Motion Re: Requesting that the Court consider the pleadings as withdrawn regarding sanctions against the Plaintiffs in the Defendants' Opposition papers.

Dear Judge Ramos,

We write on behalf of Shenzhen Hollyland Tech Co., and E.C. Pro Video Systems, Inc., (collectively, "Defendants") in the above-captioned action to request leave of Court to consider the pleadings as withdrawn, regarding sanctions against the Plaintiffs; pursuant to the Court's Order on August 19, 2024. (D.I. 358)

Defendants' requests the Court disregard and consider withdrawn the following statements contained in Defendants' pleadings:

Within D.I. 344 -

- "Plaintiffs' misconduct in gaming the system on an international stage should be sanctioned." *See* D.I. 344 at p.24.
- "Plaintiffs should be sanctioned for bringing a motion for spoliation after requesting the very destruction of Amimon components the motion is based on." *See* D.I. 344 at p.24.
- "The instant spoliation motion was done to harass, annoy and increase litigation costs, and the Court should use its inherent power to sanction, to fine the Plaintiffs for the costs associated with the defense of the motion. Defendants asks this Court to grant Defendant Rule 11 sanctions and costs associated with the needless motion practice." *See* D.I. 344 at p.24.

Within D.I. 346 -

- "The instant motion was done to harass, annoy and increase litigation costs, and the Court should use its inherent power to sanction, to fine the Plaintiffs for the costs associated with the defense of the motion. Defendants asks this Court to grant Defendant Rule 11 sanctions and costs associated with the needless motion practice." *See* D.I. 346 at p.20.

The parties have conferred, and the Plaintiffs are not opposed to Defendants' letter motion.

Dated: New York, New York

Respectfully submitted

August 29, 2024

/s/Allan Chan
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